

# ***Actions Taken Since Permit Issuance***

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## **Actions Taken By DHEC**

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- Reviewed letters of concern
- Reviewed permit conditions
- Requested additional information from USC
- Performed new modeling

## Major Issues Raised

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- Stack test data used to set permit limits
- Original modeling performed
- PM<sub>2.5</sub> attainment status

# Required Emissions Testing

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- Testing required within 180 days after startup
  - maximum expected production rate
  - PM (total), PM<sub>10</sub>, SO<sub>2</sub>, CO, NO<sub>x</sub>, & VOC
- Site-Specific Test Protocol required
  - test methods, pollutant speciation, etc.
- What if emissions are higher than permitted limits?
  - redo modeling, control device installation
- Continuous Opacity Monitor (COM)

## New Modeling Tool

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- Used *AERMOD* model:
  - Latest EPA-approved air dispersion model
  - Not required to be used until after 12/08/2006
  - Uses more realistic calculations
  - More accurately predicts pollutant impacts

## Revised Modeling

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- More accurate GIS coordinates of campus buildings and boiler stacks used
- Placed public receptors throughout campus to address public access
- Increased biomass stack height to improve dispersion
  - Meets Good Engineering Practice (GEP) stack height
- New modeling shows compliance with all standards

## **PM<sub>2.5</sub> Modeling Difficulties**

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- Currently no EPA guidelines available for permit application modeling
  - Other models available not designed to predict impacts from sources < 50 km away
- DHEC plans to install a continuous PM monitor on campus
  - Give public real-time data

## **Commitments from USC**

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- Will begin using low sulfur fuel oil in existing boilers
- Taking one boiler out of service
- Increase stack height of biomass unit
- Install control device after stack test if needed
- Pursuing other voluntary emission reduction measures - mobiles sources



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# Questions